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**UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF
CALIFORNIA- WESTERN DIVISION**

BALDWIN PARK FREE SPEECH
COALITION, et al.,

Plaintiffs,

vs.

CITY OF BALDWIN PARK,
Defendant.

Case No.: 2:19-cv-09884- CAS -E

DECLARATION OF PAUL
COOK IN SUPPORT OF
PRELIMINARY INJUNCTION

Date: February 3, 2019

Time: 10:00 a.m.

Ctrm: 8D

Action Filed: Nov. 18, 2019

DECLARATION OF PAUL COOK

I, PAUL COOK, declare as follows:

1. Submitted at Exhibit s 3 and 4 to the Declaration of Robert Ehlers are photos of two billboards located near the property where Plaintiff Ehlers' banners are displayed. I measured the Modelo and accident lawyer billboard's length with a tape measure. I measured the billboard's height by estimating the height with the ladder next to it. The length was 20'. The height is estimated to be 10'.
2. For the FIOS temporary banner displayed in Exhibit 5, I measured the size of the sign by counting the number of bricks in the wall the sign covered. I estimate each brick is 3 inches by 12 inches. I estimate the sign to be 40' x 10'.
3. The "FREE CRAFT EVENT" temporary banner depicted in Exhibit 6 is about 21' x 4.5'. I measured this temporary banner with a measuring tape.
4. The "WE CASH ALL TYPE OF COMMERCIAL CHECKS" temporary banner depicted in Exhibit 7 is about 12' x 6'. I measured the signs with a measuring tape.
5. The "JP Automotive" temporary banner depicted in Exhibit 8 is about 12' x 4'. I measured this temporary banner with a measuring tape, which is 30 percent larger than the maximum 35 square feet restriction in the Municipal Code.
6. The "NICHOLS LUMBER" temporary sign depicted in Exhibit 9 is about 19.5' x 9.5'. I measured this temporary banner with a measuring tape.
7. I reviewed the City Council file approving the billboards depicted in Exhibits 3 and 4, advertising two casinos. The file contains an executive report¹, stating that the billboards are 672 square feet. These billboards are about eight times the size of Plaintiff Ehlers' temporary banners affixed to his building.

¹ <https://www.baldwinpark.com/docssidemenu/community-development/planning/environmental-documents/digital-billboards-is-mnd-final/969-blpk-003-digital-sign-ordinance-executive-summary-september-12-2016/file>

1 **ADMINISTRATIVE HEARING**

2 8. On June 24, 2019, I emailed the City Manager, requesting that Elhers' fines be
3 dismissed. I received a response from Mr. Tafoya, the contract City Attorney
4 for Baldwin Park.

5 9. Mr. Tafoya informed me that Mr. Ehler must pay a \$1,000 deposit as a
6 condition of receiving an administrative due process hearing. From June 24,
7 2019 until the filing of this action, I emailed the City Manager, the contract
8 City Attorney, the City Finance Director and the City Clerk in an attempt to
9 resolve this matter. All said they do not have the authority to discuss the
10 matter, grant an extension or waive the deposit.

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15 I declare under penalty of perjury under the laws of the United States that the
16 forgoing is true and correct. Executed on 29 th of December, 2019 at Baldwin
17 Park, California.

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20 Paul Cook